

## **REMARKS**

Claims 38, 40 and 74 are amended. Claims 83-101 are added. Claims 38-101 are in the application for consideration.

Independent claims 38 and 74 stand rejected as being anticipated by U.S. Patent No. 6,270,572 to Kim et al. Such claims have been amended to recite that the multiple time spaced inert purge gas pulses are characterized by a period of time between two adjacent of the multiple time spaced inert purge gas pulses which is void of flowing the first precursor gas and the second precursor gas to the chamber. Such is clearly supported from Applicant's application as-filed. For example, Applicant shows numerous embodiments involving P1, P2 and IN pulses to a deposition chamber, with Fig. 4 specifically showing two adjacent IN pulses among P1 and P2 pulses which are void of flowing P1 and P2 to the chamber between the IN pulses. Accordingly, no new matter is added.

The Examiner asserts that the Fig. 11 steps 120 and 130 of Kim et al. are equivalent to what Applicant recited in original claims 38 and 74. However, the Kim et al. reference has an intervening P2 step 125 between 120 and 130, which is contrary to Applicant's amended claims 38 and 74. Accordingly, Applicant's amended claims 38 and 74 recite something which is not disclosed by Kim et al., and the anticipation rejection must be withdrawn. Action to that end is requested.

Applicant's claim 40 has been rewritten into independent form, and previously stood rejected as being anticipated by Kim et al. Claim 40 has also been amended to recite that the plurality of first precursor gas pulses is 'more

than two during the formation of the first monolayer. Accordingly, such obviates the Examiner's §102 rejection of claim 40, as the repetition to which the Examiner refers is relative to the formation of another monolayer, not the claim recited "during formation of the first monolayer". Therefore, amended claim 40 should be allowed, and action to that end is requested.

Claims 83-101 are added. Claims 85-94 are patterned after claims 53-62 and depend from claim 75. Claims 95-101 are patterned after claims 64-70 and depend from claim 76.

Each of Applicant's dependent claims should be allowed as depending from allowable base claims, and for their own recited features which are neither shown nor suggested in the cited art. Action to that end is requested.

This application is believed to be in immediate condition for allowance.

Respectfully submitted,

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